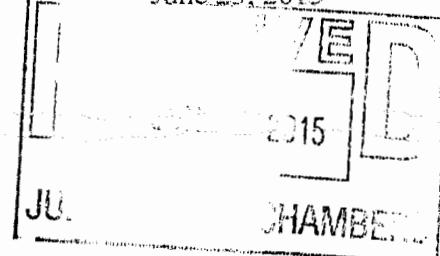


Joseph V. DeMarco
Telephone: 212.922.9499
jvd@devoredemarco.com

June 23, 2015



By Email and Facsimile

Honorable Robert W. Sweet
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 1940
New York, New York 10007-1312

Re: Elsevier, Inc., et al. v. Sci-Hub, et al., 15-cv-4282 (RWS)

Dear Judge Sweet:

We represent Elsevier Inc, Elsevier B.V., and Elsevier Ltd., the Plaintiffs in the above-referenced matter, which was filed on June 3, 2015. Plaintiffs filed an Application for an Order Authorizing Alternative Service of Process and Motion for a Preliminary Injunction and Order Transferring Domain Names, which was granted on June 18, 2015 (Dkt. 15). That Order specified certain email addresses at which the John Doe defendants could be served through their domain registration anonymization providers. We write to request permission to serve certain of those John Doe defendants at alternate email addresses for the reasons described below.

Sci-Hub.org

Since the date of our Application, the operators of bookfi.org have changed their domain registration anonymization provider from Fundacion Private Whois to Whois Privacy Corp. As a result, their contact information has changed from the address listed in our Application and the Court's Order to 5438063a3qami6zo@5225b4d0pi3627q9.whoisprivacycorp.com. (See attached Exhibit 1.)

Libgen.org

Our application requested permission to serve on Defendant libgen.org through its domain registration anonymization provider Whois Privacy Corp. at 54a8a84d7kaxh3nt@5225b4d0pi3627q9.whoisprivacycorp.com. This address is the "Admin Email" for the domain, rather than the "Registrant Email." (See Declaration of Anthony Woltermann, Dkt. 8, Exh. E.) While we believe that email sent to this address would reach the operators of libgen.org, for the sake of consistency with our other requests, we request



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*So ordered
Sweet USDC
6-24-15*

permission to serve the operators of libgen.org at their “Registrant Email” address 54a8a84ays7z9z21@5225b4d0pi3627q9.whoisprivacycorp.com.

Libgen.info

In our Application, we requested permission to serve the operators of libgen.info through their domain registration anonymization provider at 54ada35fyv9gp5gt@5225b4d0pi3627q9.whoisprivacycorp.com. Due to what we believe to be a transcription error, the Court’s Order instead specified the address 54a19036ejtinug6@5225b4d0pi3627q9.whoisprivacycorp.com (the correct address for Defendant estrorecollege.org). We write to seek permission to serve the original address as previously requested.

Bookfi.org

Since the date of our Application, the operators of bookfi.org have also changed their domain registration anonymization provider from Fundacion Private Whois to Whois Privacy Corp. As a result, their contact information has changed from the address listed in our Application and the Court’s Order to 542437c7caakpmkl@5225b4d0pi3627q9.whoisprivacycorp.com. (See attached Exhibit 2.)

In sum, for the reasons described above, we respectfully request that the Court authorize Plaintiffs to serve:

- Defendant Sci-Hub.org at 5438063a3qami6zo@5225b4d0pi3627q9.whoisprivacycorp.com;
- Defendant Libgen.org at 54a8a84ays7z9z21@5225b4d0pi3627q9.whoisprivacycorp.com;
- Defendant Libgen.info at 54ada35fyv9gp5gt@5225b4d0pi3627q9.whoisprivacycorp.com; *and*
- Defendant Bookfi.org at 542437c7caakpmkl@5225b4d0pi3627q9.whoisprivacycorp.com.

Thank you in advance for your consideration of this request.

Respectfully submitted,



Joseph V. DeMarco

EXHIBIT 1 – Sci-Hub.org Domain Registration Information (retrieved June 23, 2015)**Whois Record (last updated on 2015-06-23)**

Domain Name:SCI-HUB.ORG
Domain ID: D162049223-LROR
Creation Date: 2011-04-16T10:51:37Z
Updated Date: 2015-06-20T19:39:27Z
Registry Expiry Date: 2016-04-16T10:51:37Z
Sponsoring Registrar:Internet.bs Corp. (R1601-LROR)
Sponsoring Registrar IANA ID: 814
WHOIS Server:
Referral URL:
Domain Status: pendingTransfer -- http://www.icann.org/epp#pendingTransfer
Registrant ID:INTEm3b38m6nmcnu
Registrant Name:Domain Admin
Registrant Organization:Whois Privacy Corp.
Registrant Street: Ocean Centre, Montagu Foreshore
Registrant Street: East Bay Street
Registrant Street: ***Contact the owner by email only***
Registrant City:Nassau
Registrant State/Province:New Providence
Registrant Postal Code:0000
Registrant Country:BS
Registrant Phone:+44.7546458118
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email:5438063a3qami6zo@5225b4d0pi3627q9.whoisprivacycorp.com
Admin ID:INTEdeeks74bgx2d
Admin Name:Domain Admin
Admin Organization:Whois Privacy Corp.
Admin Street: Ocean Centre, Montagu Foreshore
Admin Street: East Bay Street
Admin Street: ***Contact the owner by email only***
Admin City:Nassau
Admin State/Province:New Providence
Admin Postal Code:0000
Admin Country:BS
Admin Phone:+44.7546458118
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email:5438063a4u2pjeou@5225b4d0pi3627q9.whoisprivacycorp.com
Tech ID:INTEwij5bdsvgomv
Tech Name:Domain Admin

EXHIBIT 2 – Bookfi.org Domain Registration Information (retrieved June 23, 2015)**Whois Record (last updated on 2015-06-23)**

Domain Name:BOOKFI.ORG
Domain ID: D161142448-LROR
Creation Date: 2011-01-07T20:43:54Z
Updated Date: 2014-12-11T12:46:40Z
Registry Expiry Date: 2016-01-07T20:43:54Z
Sponsoring Registrar:Internet.bs Corp. (R1601-LROR)
Sponsoring Registrar IANA ID: 814
WHOIS Server:
Referral URL:
Domain Status: clientTransferProhibited -
- <http://www.icann.org/epp#clientTransferProhibited>
Registrant ID:INTEt473lzigc99z
Registrant Name:Domain Admin
Registrant Organization:Whois Privacy Corp.
Registrant Street: Ocean Centre, Montagu Foreshore
Registrant Street: East Bay Street
Registrant Street: ****Contact the owner by email only****
Registrant City:Nassau
Registrant State/Province:New Providence
Registrant Postal Code:0000
Registrant Country:BS
Registrant Phone:+44.7546458118
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email:542437c7caakpmkl@5225b4d0pi3627q9.whoisprivacycorp.com
Admin ID:INTE16qa4twzgm4r
Admin Name:Domain Admin
Admin Organization:Whois Privacy Corp.
Admin Street: Ocean Centre, Montagu Foreshore
Admin Street: East Bay Street
Admin Street: ****Contact the owner by email only****
Admin City:Nassau
Admin State/Province:New Providence
Admin Postal Code:0000
Admin Country:BS
Admin Phone:+44.7546458118
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email:542437c773jlep4l@5225b4d0pi3627q9.whoisprivacycorp.com
Tech ID:INTEh0f0hsx5g18i